

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

Vincent L. Taylor

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

Computer Sciences Corporation  
(DXC Technology)

**COMPLAINT**

Jury Trial: ☒ Yes ☐ No  
(check one)

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CLERK  
U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
RECEIVED

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

**I. Parties in this complaint:**

A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	Vincent Taylor
	Street Address	PO Box 2131
	County, City	Burlington Cinnaminson,
	State & Zip Code	New Jersey 08077
	Telephone Number	856.375.5480

It's very important that I provide the court with a summary of my 40 years work experience in the Information Technology Industry since 1977 when I graduated from Cumberland County Vocational Technical Center as a Cobol Programmer before Computer Sciences Degrees were offered by Colleges and Universities. My work history consisted of multiple (MS, DB, MH, ML, ET, CS) companies over the years to provide an idea how long my expertise and work experiences has been to have destroyed by individuals for whatever reason or agenda they may have had impacting my life and child who depend on me. I find myself fighting for justice at 61 years old when I should be looking forward to retirement.

I was hired by ETS in April 2000 as a Network Engineer/Administrator they outsourced to CSC 2001 and placed me under Desktop instead of Network Support and no involvement with desktop and eventually voice and operations was pulled under DC after removing me from CSC. This is a David vs Goliath type litigation and the truth will prevail when all facts have been reviewed and I be made whole again this late in life after so much physical and mental suffering, humiliation, career destroyed, financial ruin, losing my home, living out of my car, and relying on Public assistance for the first time in my adult life.

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name Computer Sciences Corporation (DXC Technology)  
 Street Address 1775 Tysons Boulevard  
 County, City Fairfax, Tysons  
 State & Zip Code Va 22102

Defendant No. 2

Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 County, City \_\_\_\_\_  
 State & Zip Code \_\_\_\_\_

Defendant No. 3

Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 County, City \_\_\_\_\_  
 State & Zip Code \_\_\_\_\_

Defendant No. 4

Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 County, City \_\_\_\_\_  
 State & Zip Code \_\_\_\_\_

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (check all that apply)

☐ Federal Questions ☒ Diversity of Citizenship  
☐ U.S. Government Plaintiff ☐ U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? \_\_\_\_\_

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship NEW JERSEY

Defendant(s) state(s) of citizenship VIRGINIA

### III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? SEE ATTACHED

B. What date and approximate time did the events giving rise to your claim(s) occur? See ATTACHED

C. Facts: SEE ATTACHED

What  
happened  
to you?

Who did  
you meet?

Was  
anyone  
else  
involved?

o else  
what  
opened?

EEOC Charge No17E-2012-00115

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**III Statement of Claim:**

- A. ETS/CSC – Princeton, New Jersey (Rosedale)
- B. During hours 9am - 8pm
  - a. Dates: Jan 1/1/09, 7/27/09, 11/11/09, 11/23/09, 01/25/10, and 2/12/10
- C. Facts:
  - a. Worked on account for over 10 years with no major problem
  - b. Never received average higher than 3 on my annual review
  - c. Post DC work environment changed dramatically bar lowered
  - d. Differential treatments started with me than white co workers
  - e. DC sarcastic, admitted lied, didn't like me for whatever reason
  - f. DC gave others credit for my efforts and ideas (DR, NCR)
  - g. Picture of black man used to mock me across from my desk
- D. November 23, 2009 – Dr. apt headaches and poor checkup blood pressure high
  - a. Dr. was very concerned usually I had a good bill of health told to me to fix it
- E. February 12,15, 2010 – JR, TA, MB, smacking button make gross comments about work
- F. February 18, 2010 Don issued disconnect for a production voice circuit and disrupted business
- G. February 19, 2010 DC came to my desk cursed me said I gave him wrong information my fault for outage got up from chair smacked while mumbling stupid black something I heard came from his mouth and was shocked and frightened by action and this the 2<sup>nd</sup> time of rage
  - a. Went to his office later to ask why he blamed me for 3hr outage, requested information, and an apology but he ignored me then left his office.
  - b. MB called me colored word I have not heard in years
  - c. JM leaped at me smack his hands together in my face
  - d. JR conversations about Africans walking Heina on chains
  - e. Problems all over ETS account (Project status docs) singled me out
- H. CSC hired Don April 2009 and his first review out of everyone working for him I got a 4 rating
  - a. DC hired 2009 7<sup>th</sup> Manger I worked for and started disrespecting by Oct. 2009
  - b. DC sided with others and presumed I was wrong as it relates to majority of issues
  - c. DC ruled in lesser favor of me in support of others after I provided proof (R Servers)
  - d. DC received training from me as related to Operations process and the SDEP process
  - e. DC monitoring, working my responsibilities performing changes not others on team
- I. March 16, 2011 Don sent me an email questioning validity of description for servers on switch
- J. March 17, 2011 Replied Don email reminding him this ongoing problem we discussed before
- K. Dean Mooney hired Don felt professional courtesy to inform him of our issues HR ticket
  - a. He requested name of HR Rep and I provided him her name Renee Brown

IV. Injuries:

SEE ATTACHED

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. \_\_\_\_\_

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V. Relief:

SEE ATTACHED

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

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**EEOC Charge No17E-2012-00115**

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**IV Injuries:**

**Lack of sleep, headaches, stress, concentration, low self-esteem, confidence, blood pressure levels elevated and prescribed 300 mg BuPROPion Hydrochloride extended release prescribe by phycatrist. Dealing with same issues everyday and somedays are better than others can't move at all become withdrawn especially after revisiting these old nightmares from work.**

**V Relief:**

**Before all this I was looking forward to retirement in a few more years after working since I was 14 years old and could not imagine 65 retirement and now trying to start all over at age 61 don't look good. I had to prematurely cash in a Pension to survive in 2014 and finances are in ruins taking a 65% hit. Where I would be now based on my 10% savings and increases would have been retiring in two years in pretty good shape. What have been through and based on my history relief would be restoring me whole financially and my dignity as a United States Citizen and African American since January 2009.**

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 15 day of FEBRUARY, 2020.

Signature of Plaintiff

Mailing Address

Telephone Number

Fax Number (if you have one)

E-mail Address

[Signature]

PO Box 2131

CINNAMINSON, NJ 08077

856.375.5480

VINTAYLO42@GMAIL.COM

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff: \_\_\_\_\_